	The Johns Hopkins University and The Johns Hopkins Hospital Health, Safety and Environment Manual Safety Policies:	<i>Policy Number</i>	HSE048
		<i>Last Review Date</i>	11/18/2016
	<i>Subject</i> Mandatory Influenza Vaccination	<i>Page</i>	1 of 5

Keywords: Immunization, Influenza, Mandatory Influenza Policy, occupational health, vaccination

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I. PURPOSE


Johns Hopkins recognizes its responsibility to provide employees a workplace free of recognized hazards. This policy is intended to maximize vaccination rates against influenza among Johns Hopkins personnel, especially those whose work requires their presence in clinical settings. The goal is to protect patients, employees, employees' family members, students, others affiliated with Johns Hopkins, and the broader community from influenza infection.

II. SCOPE

- A. This Health, Safety & Environment policy applies to the following:
 1. Employees of the Johns Hopkins Hospital (JHH), Johns Hopkins University (JHU), and the Johns Hopkins Health System Corporation (JHHSC).
 2. Non-employee personnel who provide services in Johns Hopkins Patient or Clinical Care Areas.
- B. Other Johns Hopkins entities may have companion policies governing personnel at their institutions. All JHH, JHHSC and JHU employees must adhere to all relevant Johns Hopkins companion policies while engaged at those sites. This policy does not cover patients and visitors.

III. DEFINITIONS

1. *Patient or Clinical Care Area:* Any section of a building, property, or site that is owned, leased, rented, or operated by JHH, JHHSC, or JHU (see Appendix A) where the care or provision of services to patients or study participants occurs, including, but not limited to, hospitals, outpatient clinics, student and employee health centers, and pharmacies. These areas are defined by the physical or recognized borders of any inpatient and outpatient areas where patients may be seen, evaluated, treated, or wait to be seen.

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2. *The Johns Hopkins Hospital:* Within the physical or recognized borders of the facilities of the Johns Hopkins Hospital. (Appendix A).
3. *Influenza Season:* An annually recurring time period characterized by the prevalence of outbreaks of influenza. The season typically occurs during the fall and winter months.


IV. POLICY

The Johns Hopkins Institutions' Joint Committee for Health Safety and Environment approves the following policy:

- A. As a condition of employment, appointment to the medical, residency, or allied staff, or access to Patient and Clinical Care Areas covered by this policy, all Johns Hopkins employees, faculty, medical staff, residents, fellows, temporary workers, trainees, volunteers, students, and vendors, regardless of employer, who meet one of the following conditions must receive an annual influenza vaccination or possess an approved exception (see Exception below).
 1. Primary work location is anywhere within JHH (Appendix A).
 2. Primary work location is in any Patient or Clinical Care Area (see definition).
 3. Primary purpose of visit to JHH is to conduct any type of work, including research, in a Patient or Clinical Care Area
- B. To be compliant with this requirement, personnel must do one of the following:
 1. Comply with the designated procedure for obtaining a permissible exception by the first Tuesday in November as described in this policy.
 2. Receive the influenza vaccine(s) by the first Tuesday in December, which will be provided free of charge to Johns Hopkins employees through Occupational Health Services (OHS).
 3. Provide OHS with proof of immunization if vaccinated through services other than OHS (e.g., private physician office, public clinics) by the first Tuesday in December. Proof of immunization must include a copy of documentation indicating the vaccine was received.
- C. Prior to the annual onset of influenza season and when the most current vaccination recommendations are published by the Centers of Disease Control and Prevention (CDC), The Johns Hopkins Institutions Health, Safety, and Environment Department (Occupational Health Services) will inform personnel about the following:
 1. Requirement(s) for vaccination
 2. Dates when influenza vaccine(s) are available
 3. Procedure for receiving vaccination
 4. Procedure for submitting written documentation of vaccine obtained outside Johns Hopkins
 5. Procedure for declining due to a qualified exception
 6. Consequences of refusing vaccination

V. EXCEPTIONS

- A. Medical
 1. Exceptions to required immunization may be granted for certain medical contraindications (see Appendix B). Standard criteria will be established and include:
 - a. Severe allergy to the vaccine or components as defined by the most current recommendations of the CDC's Advisory Committee on Immunization Practices (ACIP) (http://www.cdc.gov/mmwr/preview/mmwrhtml/mm60e0818a1.htm?s_cid=mm60e0818a1_e&source=govdelivery).
 - b. Guillain-Barré within six weeks of a prior influenza vaccine.
 2. Personnel requesting exception must provide documentation of medical contraindications (Appendices C & D) to Occupational Health Services (OHS) by the second Tuesday of November.

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3. A request for medical exception will be evaluated individually by OHS within twenty (20) business days after the request is presented to OHS. If the exception is for allergy to eggs, the most current CDC ACIP recommendations will be followed by OHS.
- B. Religious
 1. If personnel decline immunization because it conflicts with sincerely held religious beliefs, they must complete a request for religious exception (see Appendices E & F). Requests from JHH/JHHSC employees should be submitted to the Office of Organizational Equity. Requests from JHU employees should be submitted to the JHU Office of Institutional Equity. These requests must be received by the first Tuesday in November and will be reviewed by the Office of Organizational Equity or the Office of Institutional Equity as applicable.
 - C. Requirements Upon Receiving Exception
 1. If the exception is granted, the individual will sign either electronically or by written documentation attesting that he/she will wear a mask at all times while in any Johns Hopkins Institutions' patient care or clinical care areas (see Definitions) when within six (6) feet of a patient (see Definitions) during the influenza season (as identified by JHHS Epidemiology and Infection Prevention in consultation with the JHHS Medical Microbiology Laboratories).

VI. COMPLIANCE

- A. Any person covered by this policy who fails to comply with the vaccination requirement will be denied access to Johns Hopkins Patient or Clinical Care Areas during the annual influenza season. Such persons may also be subject to the relevant disciplinary procedures established by their respective institutional entity, as it relates to condition of employment, appointment, or access.
- B. Individuals that are granted an exception must wear a surgical mask at all times while in a Johns Hopkins Patient or Clinical Care Area and within six (6) feet of a patient during the influenza season.

VII. RESPONSIBILITIES

- A. Covered Johns Hopkins Personnel
 1. Receive influenza vaccination by the stated deadline or complete the designated process for a permissible exception.
- B. JHHS EIP
 1. Establish annual vaccination requirements. Specify and announce the beginning and end dates of the influenza season.
- C. JHH/JHHS Office of Organizational Equity
 1. Accept, evaluate, and report on requests for religious exceptions from covered JHH/JHHS personnel. Answer questions related to this policy.
- D. JHH/JHHS Human Resources
 1. Initiate disciplinary procedures for covered JHH/JHHS personnel who do not comply with this policy.
- E. JHU Office of Institutional Equity
 1. Accept, evaluate, and report on requests for religious exceptions from covered JHU personnel. Answer questions related to religious exceptions in accordance with this policy.
- F. JHU Human Resources
 1. Initiate disciplinary procedures for covered JHU staff who do not comply with this policy. Answer questions related to this policy.
- G. Occupational Health Services (OHS)
 1. Administer and track vaccinations. Accept, evaluate, grant or deny requests for medical exception. OHS will evaluate organizational Health Care Personnel vaccination rates, and frequency and reasons for vaccine declinations monthly between September and January. This information will be reported to The Joint Committee for Health Safety and Environment and HEIC EIP. The Joint Committee for Health Safety and Environment and JHHS EIP will be provided lists of personnel not compliant by the prescribed deadline each year.

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H. Supervisors and Managers

1. Ensure that all Health Care Personnel are vaccinated against influenza each year unless exception has been granted as described in this policy. Enforce mask-wearing provision of this policy as a patient safety standard

VIII. VACCINE SHORTAGE CONTINGENCY

In the event of an influenza vaccine shortage, JHHS EIP and the Office of Critical Event Preparedness and Response (CEPAR) will determine an appropriate distribution plan for the resources available. EIP and CEPAR will involve OHS, Human Resources, Pharmacy, institutional Infection Control, Administration, and other departments across all entities as needed in determining the allocation plan across JHHS. Influenza vaccine will be offered to personnel based on risk to patient population cared for, job function, and risk of exposure to influenza. Priority will be given to those who provide hands-on patient care with prolonged face-to-face contact with patients and/or have highest risk of exposure to patients with influenza. Those who are prioritized to receive vaccine will be held to the mandatory standard. Those who are not prioritized to receive vaccine will not be held to the mandatory standard for the duration of the vaccine shortage period, and recommendations will be provided to those who do not receive vaccine by JHHS EIP in conjunction with the institutional Infection Control entities.

IX. DISSEMINATION

This policy will be disseminated by:

1. Emergency management sessions and training sessions
2. In-services and grand rounds
3. Johns Hopkins Institutions intranet site and publications
4. Committees of JHU and JHHS
5. New employee orientation
6. HSE web site
7. Email
8. Statement of Attestation – JH

X. REFERENCES

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XI. REVIEW CYCLE

Annually

XII. SIGNATURES

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Chair, Joint Committee for Health Safety and Environment

Date